

Exhibit B

Proposed Order

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
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FTX TRADING LTD., *et al.*,¹ : Case No. 22-11068 (JTD)
 :
Debtors. : (Jointly Administered)
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 : Re: DI []
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ORDER CONCERNING REQUEST TO SEAL DOCUMENTS

Upon the motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in liquidation) (the “**Joint Liquidators**”), by and through the Joint Liquidators’ counsel, for entry of an order (this “**Order**”) authorizing the Joint Liquidators to file under seal (a) the *Motion of the Joint Liquidators of Three Arrows Capital, LTD. for Coordination Among Courts* (the “**Coordination Motion**”); (b) *Motion of the Joint Liquidators of Three Arrows Capital, Ltd. for Entry of an Order (I) Modifying the Automatic Stay Pursuant to 11 U.S.C. § 362(D)(1) and Bankruptcy Rule 4001 and (II) Granting Related Relief* (the “**Lift Stay Motion**”), and (c) the *Declaration of Russell Crumpler in Support of the Motion of the Joint Liquidators for Authorization to File Under Seal (A) Motion for Coordination Among Courts and (B) Motion of the Joint Liquidators of Three Arrows Capital, Ltd. for Entry of an Order (I) Modifying the Automatic Stay Pursuant to 11 U.S.C. § 362(D)(1) and Bankruptcy Rule 4001 and (II) Granting Related Relief* (the “**Crumpler Declaration**”), and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the FTX Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

157 and 1334; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion has been provided under the circumstances; and after due deliberation and sufficient cause appearing therefor; therefore,

IT IS HEREBY ORDERED THAT

1. The Motion is GRANTED as set forth herein.
2. Pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018 and Local Rule 9018-1(d), the Joint Liquidators are authorized to file an unredacted copy of the Coordination Motion under seal, subject to the Joint Liquidators making further redactions.
3. Pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018 and Local Rule 9018-1(d), the Joint Liquidators are authorized to file an unredacted copy of the Lift Stay Motion under seal, subject to the Joint Liquidators making further redactions.
4. Pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018 and Local Rule 9018-1(d), the Joint Liquidators are authorized to file an unredacted copy of the Crumpler Declaration under seal, subject to the Joint Liquidators making further redactions.
5. Unredacted copies of the Coordination Motion, the Lift Stay Motion, and the Crumpler Declaration shall not be made available to anyone except for this Court, the Committee, the U.S. Trustee, and the FTX Debtors.
6. The Joint Liquidators are authorized to file on this Court's docket and to serve on the necessary parties redacted copies of the Coordination Motion, the Lift Stay Motion, and the Crumpler Declaration.
7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. This Court shall retain jurisdiction to hear and decide any dispute related to or arising from this Order.